

EXHIBIT V

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ANNA GROVER,
PLAINTIFF

V.

SHECHTMAN HALPERIN SAVAGE, LLP,
DEFENDANT.

C.A. No. 16-041- ML-PAS

PLAINTIFF'S MOTION TO EXTEND THE DATES SET FORTH
IN THE COURT'S MARCH 14, 2016 SCHEDULING ORDER

Now comes Anna Grover, the plaintiff in the above-entitled matter, by and through her attorney, pursuant to Rules 7 and 16 of the Federal Rules of Civil Procedure and Rules cv 7 and cv 16 of the Local Rules for the United States District Court for the District of Rhode Island, and hereby moves this Honorable Court to amend the scheduling order by sixty (60) days¹ or, in the alternative, by a length of time the Court deems appropriate.

As grounds for her motion, Plaintiff states the following:

1. On August 30, 2017, Plaintiff propounded on Defendant a Second Set of Document Requests.
2. On September 30, 2017, Defendant responded timely to Plaintiff's Second Set of Document Requests, and produced some documents responsive to Plaintiff's requests, but objected to many of Plaintiff's document requests.

¹ (1) From 10/30/17 to 12/30/17 for Factual Discovery;
(2) From 11/27/17 to 1/27/18 for Plaintiff's Expert Disclosures;
(3) From 12/27/17 to 2/27/18 for Defendant's Expert Disclosures;
(4) From 2/28/18 to 4/28/18 for Expert Discovery;
(5) From 3/12/18 to 5/12/18 for Dispositive Motions; and
(6) From 3/26/2018 to 5/26/18 for Pretrial Memoranda

3. On October 18, 2017, counsel-for-the parties held a telephone conference pursuant to Fed. R. Civ. P. 37, but were unable to resolve the discovery dispute. As such, Plaintiff intends to move the Court to compel Defendant to produce the documents at issue.
4. As previously represented to the Court in a prior motion seeking to extend the scheduling order (Doc. No. 22), Plaintiff needs the documents at issue so she can take the deposition of Delila Popko, who was previously employed by Defendant as a "Billing Specialist" in its Foreclosure Department. Without the benefit of the documents at issue, Plaintiff will be unable to properly and effectively examine Ms. Popko at a deposition.
5. Plaintiff can establish "good cause" under Fed. R. Civ. P. 16 for seeking to extend the scheduling order.
6. The additional time requested is necessary to complete discovery.
7. This motion is not interposed to delay the consideration of this matter, but rather because of the exigencies outlined above.

WHEREFORE, Plaintiff requests that this Court amend the scheduling order by sixty (60) days or, in the alternative, by a length of time the Court deems appropriate.

Plaintiff,

ANNA GROVER

By Her Attorney,

/s/Mark P. Gagliardi

Mark P. Gagliardi (#6819)

LAW OFFICE OF MARK P. GAGLIARDI

120 Wayland Avenue, Suite 7

Providence, RI 02906

(401) 277-2030

(401) 277-2021 (fax)

Dated: October 30, 2017

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of October, 2017, I filed this document through the ECF system with the Clerk of the U.S. District Court for the District of Rhode Island and, therefore, all counsel-of-record has received notice electronically.

/s/Mark P. Gagliardi